

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

CHRISTOPHER LEE JOYNER, JR.,

Plaintiff,

v.

3:10-cv-406- MHL

SGT. G. O'NEIL, et al.,

Defendants.

DEFENDANTS' MEMORANDUM REGARDING
THE COURT'S PROPOSED VOIR DIRE

The defendants Sgt. Greg O'Neil and Deputy Christopher Vickrey, by counsel, and pursuant to the request of the Court file this Memorandum.

The Court's Proposed Voir Dire

The defendants have no objection to any of the proposed Voir Dire.

The defendants requests additional Voir Dire:

1. Have you had an occasion to feel that you or a family member was treated unfairly by a law enforcement officer?
2. Have you ever filed a complaint against a law enforcement officer?
3. Have you or an immediate family member had an occasion to work in a jail or prison setting whether in a law enforcement capacity or otherwise? For example, as a food service provider or medical services provider in a jail or prison setting?

Respectfully submitted,

/S/ S. Lawrence Dumville

S. Lawrence Dumville (VSB # 17803)

Jonathan L. Stone (VSB #75483)

Attorneys for: Sgt. G. O'Neil and
Deputy C. Vickrey
Norris & St. Clair, P.C.
2840 S. Lynnhaven Road
Virginia Beach, Virginia 23452
(757) 498-7700/FAX (757) 498-7744
Email: ldumville@norrisstclair.com
jstone@norrisstclair.com

CERTIFICATE OF MAILING

I hereby certify that on the 3rd day of July, 2012 I will electronically file the foregoing to the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Brandon M. Santos, Esquire
Steven George Popps, Esquire
McGuireWoods LLP
901 East Cary Street
Richmond, VA 23219-4030
Phone: 804 775-1000
Fax: 804 698-2194
bsantos@mcquirewoods.com
spopps@mcquirewoods.com

/S/ S. Lawrence Dumville

S. Lawrence Dumville (VSB 17803)
Jonathan L. Stone (VSB #75483)
Attorneys for: Sgt. G. O'Neil and
Deputy C. Vickrey
Norris & St. Clair, P.C.
2840 S. Lynnhaven Road
Virginia Beach, Virginia 23452
(757) 498-7700/FAX (757) 498-7744
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